REMARKS

The Office Action dated October 12, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

In accordance with the foregoing, claims 1-15 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter is being presented, and approval and entry are respectfully requested. As will be discussed below, it is also requested that all of claims 1-15 be found allowable as reciting patentable subject matter.

Claims 1-15 stand rejected and pending and under consideration.

OBJECTIONS TO THE CLAIMS:

In the Office Action, at page 2, claims 7-10 and 12-15 were objected to for a minor informalities. In response, claims 7-10 and 12-15 have been amended to correct such minor informalities. Accordingly, it is respectfully requested that the objections to the claims be withdrawn.

REJECTION UNDER 35 U.S.C. § 112:

In the Office Action, at page 2, claim 1 was rejected under 35 U.S.C. § 112, second paragraph, for indefiniteness.

In response, claim 1 has been amended to improve clarity and antecedent support. to more particularly point out and distinctly claim the invention

Accordingly, it is respectfully requested that the § 112, second paragraph rejections to the claims be withdrawn.

REJECTION UNDER 35 U.S.C. § 102:

In the Office Action, at page 2, claims 1, 3-6, 8-11, and 13-15 were rejected under 35 U.S.C. § 102 as being anticipated by U. S. Publication No. 2002/0027908 to Kalkunte et al. ("Kalkunte"). The Office Action took the position that Kalkunte describes all the recitations of independent claims 1, 6, and 11 and related dependent claims. This rejection is traversed and reconsideration is requested.

Independent claim 1, upon which claims 2-5 are dependent, recites a method of handling frames in a network device, said method including receiving a frame at a network device of an assembly of network devices, with the assembly of devices divided into a first side and a second side and the network device being on the first side, and examining the received frame to determine whether the frame is destined for a member of a specific trunk group. The method includes determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side, and forwarding the frame to a destination port based on being a member of the specific trunk group and the destination device identifier.

Independent claim 6, upon which claims 7-10 are dependent, recites a network device for handling frames, including receiving means for receiving a frame by a network device of an assembly of network devices, with the assembly of devices divided into a first side and a second side and the network device being on the first side, and examining means for examining the received frame to determine whether the frame is destined for a member of a specific trunk group. The network device also includes determining means for determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side, and forwarding means for forwarding the frame to a destination port based on whether the destination port is the member of the specific trunk group and the destination device identifier.

Independent claim 11, upon which claims 11-15 are dependent, recites a network device for handling frames, including a plurality of ports, configured to send and receive data frames, with at least one of said ports connected to other network devices of an assembly of network devices, with the assembly of devices divided into a first side and a second side and the network device being on the first side, and at least one port interface, for coordinating actions of said plurality of ports. The at least one port interface is configured to examine the received data frames to determine whether the data frames are destined for a member of a specific trunk group and whether a destination device identifier for the frame corresponds to one of the network devices on the second side. The at least one port interface is configured to forward the frame to a destination port

based on whether the destination port is a member of the specific trunk group and the destination device identifier.

As will be discussed below, Kalkunte fails to disclose or suggest the elements of any of the presently pending claims.

Kalkunte generally describes a method of forwarding data in a network switch fabric. See paragraph [0011] An incoming data packet is received at a first port of the fabric and a first packet portion, less than a full packet length, is read to determine particular packet information, the particular packet information including a source address and a destination address. An egress port bitmap is determined based on a lookup in a forwarding table and it is determined **if** the destination address belongs to a trunk group of trunked ports. However, Kalkunte is devoid of any teaching or suggestion providing, at least, "with the assembly of devices divided into a first side and a second side and the network device being on the first side," as recited in independent claim 1. There is no division in Kalkunte of devices into a first side and a second side, where a network device is on the first side. Furthermore, Kalkunte fails to teach or suggest, at least, "determining **whether a destination device identifier for the frame corresponds to one of the network devices** on the second side; and forwarding the frame to a destination port **based on** being a member of the specific trunk group **and** the destination device identifier," emphasis added, as recited in independent claim 1. Rather, as Kalkunte specifically describes, the determination made in this reference is whether **the destination address belongs to a *trunk group* of trunked ports**. (Emphasis added)

There is no determination made in Kalkunte whether the destination address corresponds to one of the network devices. Rather, the determination is made whether the destination address belongs to a trunk group of trunked ports.

Furthermore, Kalkunte provides that the incoming data packet is forwarded based on the egress port bitmap, when the destination address does not belong to the trunk group. When the destination address does belong to the trunk group, **a particular trunked port of the trunk group is determined** in Kalkunte and the incoming data packet is forwarded thereto. More specifically, the particular trunked port of the trunk group in Kalkunte is determined by calculating **a hash value** based on the source address and the destination value and selecting the particular trunked port based on the hash value. In contrast thereto, the present application provides, in part, "forwarding the frame to a destination port based on being a member of the specific trunk group and the destination device identifier," as recited in independent claim 1. Kalkunte does not teach or suggest that a determination is made whether the frame is for a member of a specific trunk group and a destination device identifier. Rather, Kalkunte specifically calculates a hash value and based on this hash value, a particular trunked port of the trunk group is determined. The method of Kalkunte does not teach or suggest all the features recited in independent claim 1 and related dependent claims 2-5.

Independent claim 6 recites, in part, "determining means for determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side; and forwarding means for forwarding the frame to a destination port

based on whether the destination port is the member of the specific trunk group and the destination device identifier;" and independent claim 11 recites, in part, "wherein the at least one port interface is configured to examine the received data frames to determine whether the data frames are destined for a member of a specific trunk group and whether a destination device identifier for the frame corresponds to one of the network devices on the second side; and wherein the at least one port interface is configured to forward the frame to a destination port based on whether the destination port is a member of the specific trunk group and the destination device identifier." Because independent claims 6 and 11 include similar claim features as those recited in independent claim 1, although of different scope, and because the Office Action refers to similar portions of the cited references to reject independent claims 6 and 11, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 6 and 11.

In view of the foregoing, it is respectfully requested that independent claims 1, 6, and 11 and related dependent claims be allowed.

REJECTION UNDER 35 U.S.C. § 103:

In the Office Action, at page 5, claims 2, 7, and 12 were rejected under 35 U.S.C. § 103 as being unpatentable over Kalkunte in view of U.S. Publication No. 2005/0105904 by Varanasi et al. ("Varanasi"). The Office Action took the position that Kalkunte and

Varanasi disclose all the aspects of dependent claims 2, 7, and 12. The rejection is traversed and reconsideration is requested.

Dependent claims 2, 7, and 12 depend from independent claims 1, 6, and 11, respectively. Because the combination of Kalkunte and Varanasi must teach, individually or combined, all the recitations of the base claim and any intervening claims of dependent claims 2, 7, and 12, the arguments presented above supporting the patentability of independent claims 1, 6, and 11 over Kalkunte are incorporated herein.

Varanasi generally describes a system and a method to route a flow of frames through a switch. In Varanasi, at least one frame is received from the flow of frames and a process is applied to select an exit port of the switch from a set of possible exit ports through which at least one frame from the flow of frames will exit so as to potentially reduce frame traffic congestion along potential routes that include the set of possible exit ports. The set of possible exit ports includes at least some of the exit ports of at least two trunk groups.

However, Varanasi does not cure the deficiencies of Kalkunte. Similarly to Kalkunte, Varanasi is devoid of any teaching or suggestion providing, at least, "the assembly of devices divided into a first side and a second side and the network device being on the first side," as recited in independent claim 1 and similarly recited in independent claims 6 and 11. Furthermore, similarly to Kalkunte, Varanasi fails to teach or suggest, at least, "determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side; and forwarding the frame

to a destination port based on being a member of the specific trunk group and the destination device identifier," as recited in independent claim 1 and similarly recited in independent claims 6 and 11. Rather, Varanasi focuses on selecting an exit port of the switch from a set of possible exit ports through which at least one frame from the flow of frames will exit so as to potentially reduce frame traffic congestion. Therefore, a combination of Kalkunte and Varanasi would fail to teach or suggest all the features of independent claims 1, 6, and 11, and related dependent claims.

In view of the foregoing, it is respectfully requested that dependent claims 2, 7, and 12 be allowed.

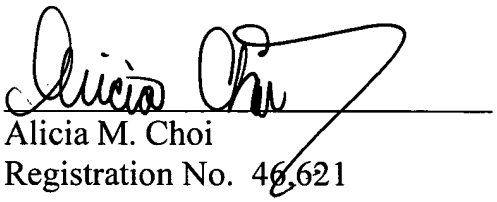
CONCLUSION:

In view of the above, Applicant respectfully submits that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicant further submits that the subject matter is more than sufficient to render the claimed invention unobvious to a person of skill in the art. Applicant therefore respectfully requests that each of claims 1-15 be found allowable and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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